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Patrick Byrne

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT HUNTER BIDEN, an
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,

Defendant.

Case No.: 2:23-cv-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom: "10A"

Complaint Filed: November 8, 2023

**DECLARATION OF MICHAEL C.
MURPHY, ESQ. IN SUPPORT OF
DEFENDANT'S MOTION IN
LIMINE NO. 5 TO EXCLUDE ANY
TESTIMONY OR EVIDENCE
REGARDING DEFENDANT'S
CHARACTER**

Date: November 25, 2024
Time: 3:00 p.m.
Courtroom: "10A"

I, Michael C. Murphy, Esq., declares as follows:

1. I am an attorney duly authorized and licensed to practice law before this Court and all the state courts located throughout the State of California. I am an attorney with the Law Offices of Michael C. Murphy, attorneys of record for Defendant Patrick Byrne. This Declaration is executed in support of Defendant's Motion in Limine No. 5 To Exclude Any Evidence Regarding Defendant's Character. I have personal knowledge of the facts stated in this Declaration and if called upon to testify, I would competently do so.

2. On November 8, 2023, Plaintiff Robert Hunter Biden ("Plaintiff") filed his complaint alleging a single cause of action for defamation per se.

3. On February 13, 2024, Defendant Patrick Byrne ("Defendant") filed his answer and affirmative defenses.

4. It is anticipated based on the allegations in Plaintiff's complaint that he plans to try to use inadmissible character evidence to attack defendant instead of offering evidence that is relevant and probative to what Plaintiff is obligated to use to prove up his liability case against the Defendant.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration was executed on November 6, 2024, at Westlake Village, CA.

By: /s/ Michael C. Murphy, Esq.